

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOMINIKA ZAKRZEWSKA,

Plaintiff,

v.

THE NEW SCHOOL, AND KWANG-WEN PAN,

Defendants.

**NOTICE OF
MOTION FOR SUMMARY
JUDGMENT**

**Civil Action No.
06 Civ. 5463 (LAK)**

ELECTRONICALLY FILED

PLEASE TAKE NOTICE, that upon the Complaint, the Affirmation of Thomas S. D'Antonio, dated April 7, 2008, the Affidavit of Keila Tennent, dated April 4, 2008, the Statement of Undisputed Facts pursuant to Rule 56 of the Federal Rules of Civil Procedure, the Appendix to the Statement of Undisputed Facts, including Exhibits A-PP, and Defendant's Memorandum of Law, dated April 7, 2008, Defendant The New School will move this Court before the Hon. Lewis A. Kaplan, at the United States Courthouse located at 500 Pearl Street, New York, New York, on a time and date to be determined by the Court, for an Order granting Defendant The New School summary judgment dismissing plaintiffs' claims in their entirety pursuant to Federal Rule of Civil Procedure 56, upon the ground that there is no genuine issue of material fact precluding summary judgment in The New School's favor.

PLEASE TAKE FURTHER NOTICE that The New School intends to file and serve reply papers.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: April 7, 2008

WARD NORRIS HELLER & REIDY LLP

/s/ Thomas S. D'Antonio

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The New School*